

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

Plaintiff,

-vs-

Criminal Action No.  
22-00048-26-CR-W-DGK

SHANIA N. BAILEY,

Defendant.

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**MEMORANDUM OF MATTERS DISCUSSED AND  
ACTION TAKEN AT PRETRIAL CONFERENCE**

The following matters were discussed and action taken during the pretrial conference:

**PENDING CHARGE:** Count 1: Conspiracy to distribute 5 kilograms or more of cocaine;  
fentanyl; and less than 50 kilograms of marijuana *in*  
*violation of* 21 U.S.C. § 841(a)(1), (b)(1)(C) and (b)(1)(D)

Counts 40, 42: Use of a Communication Facility to Facilitate a Drug  
Trafficking Crime *in violation of* 21 U.S.C. § 843(b)  
and (d)(1)

Count 91: Possession of a Firearm in Furtherance of a Drug  
Trafficking Offense *in violation of* 18 U.S.C. §  
924(c)(1)(A)(i)

Forfeiture Allegations One and Two

**TRIAL COUNSEL:**

Government: Matthew Moeder, Stephanie Bradshaw and Paralegal Michelle Wells

Case Agent: ATF Special Agent Elizabeth White

Defense: Shazzie Naseem

**OUTSTANDING MOTIONS:** None

**ANTICIPATED MOTIONS:** Government – May revise previously filed jury instructions,  
witness list, and exhibit list; Defense – None

**TRIAL WITNESSES:**

Government: 5 with stipulations in addition to witnesses for Defendant Hicks-Berry

Defense: 3 witnesses, including Defendant who ( ) will  
( x ) may  
( ) will not testify

**TRIAL EXHIBITS:**

Government: 50 exhibits

Defense: 25 exhibits

**DEFENSES:**

☒ defense of general denial

☐ defenses of general denial and \_\_\_\_\_

**POSSIBLE DISPOSITION:**

☐ Definitely for trial

☐ Possibly for trial

☐ Motion to continue to be filed

☒ Likely a plea will be worked out

**TRIAL TIME:** 1 day for only Defendant Bailey; with Defendant Bailey and Defendant Hicks-Berry 5.5 days

Government's case including jury selection: .5 days

Defense case: .5 day

**STIPULATIONS:**

☐ not likely

☐ not appropriate

☒ likely as to:

☐ chain of custody

☒ chemist's reports

☐ prior felony conviction

☐ interstate nexus of firearm

☒ other: search warrant returns/communications

**UNUSUAL QUESTIONS OF LAW:** None

**FILING DEADLINES:****Witness and Exhibit Lists:**

Government: On or before October 7, 2024

Defense: On or before October 7, 2024

**Counsel are requested to list witnesses in alphabetical order on their witness list.**

**Exhibit Index, Voir Dire, Jury Instructions:** On or before October 7, 2024

**Jury instructions must comply with Local Rule 51.1**

**Motions in Limine:** On or before October 7, 2024

**TRIAL SETTING:** Criminal jury trial docket commencing 10/21/2024. Defense Counsel has no conflicts; however, a co-defendant requests the second week of the docket. The Government has no conflicts; however, a necessary witness is unavailable on October 28, 2024, thus, the Government will plan its case around that unavailability.

**OTHER:**

- ( ) A \_\_\_\_\_-speaking interpreter is required.  
( ) Other assistive devices: \_\_\_\_\_

**IT IS SO ORDERED.**

/s/ Jill A. Morris  
JILL A. MORRIS  
United States Magistrate Judge